

California Regional Water Quality Control Board Santa Ana Region

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August 14, 2006

Base Realignment and Closure Attn: Mr. Darren Newton BRAC Environmental Coordinator 7040 Trabuco Road Irvine, California 92618

COMMENTS ON INFORMATION PACKAGE, EXPLORATION EXCAVATION ACTIVITIES, MSC JP5 PIPELINES NEAR FORMER SUMP AT BUILDING 658, FORMER MARINE CORPS AIR STATION, EL TORO, SWRCB GEOTRACKER ID: T0605964530

Dear Mr. Newton:

We have reviewed the above referenced document, dated June 30, 2006, which we received on July 6, 2006. Soil that was removed during excavation at the site was screened for petroleum impact, utilizing a photo-ionization detector. The soil was separated in two stockpiles. Stockpile 2 contains 15 cubic yards of soil with vapor concentrations above 50 parts per million that was determined as impacted. Stockpile 1 contains 20 cubic yards of non-impacted soil. A single soil sample was collected from each stockpile for waste characterization. We concur with your recommendations for disposal at an appropriate facility for Stockpile 2, and for placement of Stockpile 1 soil on an unpaved area of ground near the excavation site on the former Marine Corps Air Station, El Toro.

It must be noted that Board staff is developing a TMDL (total maximum daily load) for the Newport Bay and San Diego Creek watershed, to address the problem of sediments that are polluted with organochlorine compounds, including chlordane. The analytical results for Stockpile 1 indicated that a total chlordane concentration of 6 micrograms per kilogram (μ g/kg). The proposed sediment target of San Diego Creek and tributaries is 4.6 μ g/kg dry weight chlordane. The characterization levels in the stockpile exceed the proposed target concentration; therefore, after the TMDL is promulgated, the location were Stockpile 1 is placed will require management to ensure that this soil will not be transported into the watershed.



For any questions, please call me at (951) 782-4494, or send email to ibroderick@waterboards.ca.gov.

Sincerely,

John Broderick SLIC/DoD Section

cc via email: Ms. Content Arnold, BRAC PMO WEST

Ms. Lynn Hornecker, BRAC PMO WEST